

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Provision of Directory Listing Information under
 the Telecommunications Act of 1934, As Amended

CC Docket No. 99-273

In the Matter of

Telecommunications Relay Services and Speech-to-
 Speech Services for Individuals with Hearing
 and Speech Disabilities

CC Docket No. 98-67

Comments of Illuminet, Inc.

Illuminet, Inc. ("Illuminet") hereby files these comments in response to the April 27, 2000 Public Notice issued by the Federal Communications Commission ("Commission") in the above-captioned proceedings.¹ In the Public Notice, the Commission seeks comments on a March 10, 2000 Ex Parte Presentation² filed by Telegate, Inc. ("Telegate") in which Telegate requests the Commission to find that presubscription of "411" Directory Assistance ("DA") is in the public interest and to implement that finding through modifications to the Advanced Intelligent Network ("AIN") platform.³ Illuminet comments solely on the technical issues associated with the appropriate database platform that should be used to implement DA

¹ See Public Notice, DA 00-930, released April 27, 2000 ("Public Notice").

² See Ex Parte Presentation of Telegate, Inc., CC Docket No. 99-273, dated March 10, 2000 ("Presentation").

³ See *id.* at 13-14. The Commission also requests comments regarding whether other "N11" services, such as Telecommunications Relay Service dialed via "711," should also be subject to presubscription. See Public Notice at 3.

presubscription, assuming such presubscription is found to advance the public interest. For the reasons stated below, Illuminet respectfully submits that, should the Commission first find that presubscription of DA would advance the public interest, the existing Line Information Database ("LIDB") platform with minor modifications should be relied upon to implement that directive.

Illuminet provides a wide variety of services to local exchange carriers, interexchange carriers, wireless carriers and competitive local exchange carriers. Illuminet's services include Signaling System No. 7 network functions and related line information database ("LIDB") services, calling card billing validation services, 800 RESPORG services and revenue administration. Based on its experience, Illuminet submits that, with minor modifications and minimal expense,⁴ the existing LIDB platform can be used to support the necessary database and downstream billing functions required to implement DA presubscription, should such presubscription be found by the Commission to advance the public interest.

Although Telegate supports utilization of AIN, Telegate recognizes that AIN is not ubiquitously deployed in the network,⁵ as is LIDB. Moreover, because the necessary LIDB databases are already in existence and would require minimal additional information, reliance upon the LIDB platform also renders moot the need for and the additional costs associated with

⁴ Based on its review and analysis, Illuminet believes that each LIDB provider would only be required to add a new data element to the existing LIDB protocol, an undertaking that the industry previously has demonstrated in the context of number portability to be readily achievable. The new data element would also be required to be populated with the subscriber's selected DA provider. This function, however, can readily be accomplished since the administrative and data gathering processes already exist for LIDB. Further, Illuminet notes that existing query protocols and response protocol formats can be used to access and retrieve the information contained in the new data element.

⁵ See Presentation at 12.

the development, maintenance and administration of, and arranging access to, the seven (7) regional Signal Control Points (i.e., databases) and Signal Transfer Point switches that Telegate suggests are necessary to implement its AIN-based proposal.⁶ Further, reliance upon the LIDB platform avoids the additional burden on carriers of submitting updates and information to duplicative platforms where AIN has not been deployed.

There is no need, in Illuminet's view, to "reinvent the wheel." The LIDB platform has a demonstrated history of service expansion and real time call processing capability. The administrative process associated with LIDBs are in existence today. Further, LIDB works in a portability environment, facilitates the billing process through the provision of necessary information and the existence of fraud controls, and otherwise was developed to store and provide access to information at the access line level such as that required for DA presubscription. Most importantly, however, LIDB offers these functions and capabilities throughout the network today and would require only minor modifications at minimal additional expense to implement DA presubscription should a finding be made that DA presubscription advances the public interest.


In Illuminet's view, LIDB offers a simple, reliable, technically achievable and economically efficient basis in comparison to the AIN model proffered by Telegate. Accordingly, should the Commission find that DA presubscription as proposed by Telegate advances the public interest, Illuminet respectfully requests that the Commission implement that

⁶ See id. at 14.

finding by relying upon the existing LIDB platform and directing the industry to undertake the minor modification required to implement that finding.

Respectfully submitted,

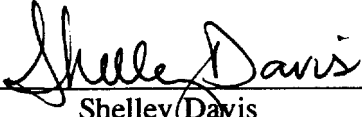
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May 30, 2000

CERTIFICATE OF SERVICE

I, Shelley Davis, hereby certify that a copy of the foregoing "Comments of Illuminet, Inc." was served on this 30th day of May 2000, by first class, U.S. mail, postage prepaid to the following parties:


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